

**ATIP FILE NUMBER: PB-2018-00394****Material Privacy Breach Determination**

A material privacy breach has the highest risk impact and is defined as:

- Involving sensitive personal information (1); and
- Could reasonably be expected to cause serious injury or harm to the individual (2) and/or involves a large number of affected individuals (3).

1. Sensitive Personal Information Criteria

1a) "Sensitive personal information" includes, but is not limited to, the following:

Sensitive Personal Information – If 'Yes' is chosen, provide details below.		
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Medical, psychiatric or psychological information;
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Information compiled and identifiable as part of an investigation into a possible violation of law;
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Criminal history;
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Information on the eligibility for social benefits or the determination of benefit levels;
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Information describing an individual's finances (income, assets, liabilities, net worth, bank balances, tax returns, financial history or activities, or creditworthiness);
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Information containing personal recommendations or evaluations, personal opinions about a sensitive subject, character references, or personnel evaluations;
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Information concerning an individual's racial or ethnic origin or religious or political beliefs and associations or lifestyle; and
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Certain tombstone information, including birthdate and Social Insurance Number.

1b) Specific elements of sensitive information: Biographical information, contact information, criminal checks, educational information, credit card information, date of birth, citizenship status, credit history, employee personnel information, financial information, driver's licence number, place of birth, signature, gender, name, photographs of individual

2. Serious Injury or Harm Criteria and/or

2a) "Serious injury to the individual" includes the following:

Serious Injury or Harm to the Individual – If 'Yes' is chosen, provide details below.		
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Identity theft or some other related fraud;
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Material loss to the individual; and



Yes No

Lasting harm or embarrassment that will have direct negative effects on a litigation involving the individual, on an individual's career, reputation, financial position, safety, health or well-being.

2b) Brief description of potential injury: There is a potential for identity theft causing financial loss due to this breach.

3. Involves a Large Number of Affected Individuals

3a) The institution must also take the number of affected individuals into consideration when determining a material privacy breach, as the more individuals affected raises the risk of causing serious injury or harm.

Large Number Affected – If 'Yes' is chosen, provide details in 3b.

Yes No

The breach involves a large number of affected individuals.

3b) Number of individuals affected: 1

Material Privacy Breach Determination Summary

Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Sensitive Personal Information Criteria Met.
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Serious Injury or Harm Criteria Met <u>and/or</u> Involves a Large Number of Affected Individuals
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	The Incident is Deemed a Material Privacy Breach (both of the above boxes are checked yes)

From: [Polkey, Sarah](#)
To: [Bolger, Charlotte](#)
Subject: FW: Privacy Breach Report
Date: Wednesday, July 11, 2018 1:52:30 PM
Attachments: [Preliminary Privacy Breach Report-eng.docx](#)

Hi Charlotte,

Please find attached the electronic copy of the preliminary report so you can use it to fill out the ATIP version.

I spoke to Darren and he explained a bit more about the incident, you could use this information in the investigation portion of the report. He said that when they send a file to another department there is a transmittal note which confirms that it was sent. In this case, as the file was sent more than two years ago, the transmittal note would already have been destroyed so we don't have anything further to confirm that it was sent, just a note on the file. When he followed up with Transport they said they hadn't received the file, and that they don't have it. He sent an email to the manager at Transport asking them to double check that they did not have the records, but he's been waiting a week and has not heard back from them.

He asked if we would be contacting the Transport ATIP shop about the breach and mentioned that he did that in the past at another department where he worked. He was saying that as we can't confirm where the documents may have been misplaced it could be either of our departments. I will also mention the possibility of contacting their ATIP office to Melanie as I'm interested to see if it's something she's done before.

If you have any questions please let me know.

Thanks, Sarah

From: Costain, Darren
Sent: July-11-18 1:15 PM
To: Polkey, Sarah
Subject: Privacy Breach Report

As requested.

Darren Costain

Deputy Director, Security Operations
Fisheries and Oceans Canada / Government of Canada
Darren.Costain@dfo-mpo.gc.ca / Tel: 613 990-1575 / fax: 613 991-3302

Directeur adjoint, Opérations de sécurité
Pêches et Océans Canada / Gouvernement du Canada
Darren.Costain@dfo-mpo.gc.ca / Tél. : 613 990-1575 / Télécopieur : 613 991-3302

[Security Screening – Instructions and Requirements](#)

Filtrage de sécurité – Instructions et exigences



Access to Information and Privacy

SUSPECTED PRIVACY BREACH REPORT

PROTECTED B (WHEN COMPLETED)

If a privacy breach is suspected, the OPI must contain the incident and report it to ATIP through this form, in accordance with the DFO Standard on Privacy Breaches.

Privacy Notice

Personal information provided on this form is collected under the authority of the *Financial Administration Act* and as required under the *Policy on Government Security*, *Public Service Employment Act*, and the *Criminal Code* for the purpose of investigating and reporting privacy breaches. Other consistent uses and disclosures are described in the [Security Incidents and Privacy Breaches Personal Information Bank \(PSU 939\)](#) of *Info Source*. Failure to provide necessary personal information will result in non-compliance with the [DFO Privacy Policy](#) and may compromise the investigation process. Individuals have the right to the correction of, access to, and protection of, personal information under the *Privacy Act* and to file a complaint with the [Privacy Commissioner of Canada](#) over DFO's handling of their information. For more information, contact DFOprivacy-vieprivéeMPO@dfp-mpo.gc.ca or visit www.infosource.gc.ca.

PART 1 – Incident Details

Date of incident:	Time of incident:	Location of incident:
Between November 2, 2016 and June 20, 2018		Unknown (DFO or Transport Canada)

Brief description of the incident (what happened, how it happened, how it was discovered, etc.):

Personnel Security Screening file for [REDACTED] went missing when transferred between departments around November 2, 2016. It was only recently discovered missing when we received a request to verify his clearance for another department.

[REDACTED] was seconded to DFO [REDACTED]. DFO requested [REDACTED] file on October 6, 2016; however, subsequently cancelled the request because [REDACTED] at the time was only on secondment with our department. Transport had already transferred the file and DFO received the file on (or around) November 2, 2016. DFO immediately returned the file to Transport with explanation that the employee was only on secondment.

DFO has conducted a throughout search of its files to no avail.

Identify the individual(s) whose personal information was compromised (include contact info if possible). Attach a list if necessary.

[REDACTED]	His home address on file is : [REDACTED]
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Is the individual(s) aware of the incident?

Yes No Electronic Paper Other (describe):

What elements of personal information were involved (check all that apply)?

<input checked="" type="checkbox"/> Biographical information	<input type="checkbox"/> Biometric information	<input checked="" type="checkbox"/> Citizenship status
<input checked="" type="checkbox"/> Contact information	<input checked="" type="checkbox"/> Credit card information	<input checked="" type="checkbox"/> Credit history
<input checked="" type="checkbox"/> Criminal checks/history	<input checked="" type="checkbox"/> Date of birth	<input type="checkbox"/> Date of death
<input checked="" type="checkbox"/> Educational information	<input type="checkbox"/> Employment equity information	<input type="checkbox"/> Employee identification number (PRI etc.)

<input checked="" type="checkbox"/> Employee personnel information	<input checked="" type="checkbox"/> Financial information	<input checked="" type="checkbox"/> Gender
<input type="checkbox"/> Language/language preference	<input type="checkbox"/> Medical information	<input checked="" type="checkbox"/> Name
<input type="checkbox"/> Opinions or views of, or about, individuals	<input checked="" type="checkbox"/> Other ID numbers (FIN, driver's licence etc.)	<input checked="" type="checkbox"/> Photographs of individuals
<input type="checkbox"/> Physical attributes	<input checked="" type="checkbox"/> Place of birth	<input type="checkbox"/> Place of death
<input type="checkbox"/> Positional information (latitude/longitude etc.)	<input checked="" type="checkbox"/> Signature	<input type="checkbox"/> Social Insurance Number
<input type="checkbox"/> Vessel information	<input type="checkbox"/> Other (List any other categories of personal information that does not fit anywhere else. Please Specify below.)	

Other elements (i.e. information that may cause harm to an individual, if breached):

Describe the immediate containment measures and/or interventions taken, if any (refer to DFO's Immediate Containment Measures and TBS' Office of Primary Interest (OPI) Preliminary Assessment and Containment).

The employee was advised immediately and a new credit check was completed and provided to the employee to ensure no identity theft occurred. A throughout search of DFO files was completed without success. Transport Canada, Personnel Security Division was advised and requested to verify files, no response to date.

Has the supervisor or program manager been notified of the incident? Yes No

List all of the individuals involved and their role in the incident (witness, investigator, individual who may have caused the breach, victims, etc.) Attach a list if necessary.

1. Name	Title/Position	Contact Information
Darren Costain	Deputy Director, Security Operations	Darren.Costain@dfo-mpo.gc.ca

Describe how this person was involved?

Informed affected employee, directed a serach of files and contacted Transport Canada.

2. Name	Title/Position	Contact Information
Julie Beaubien	Manager Personnel Security and Passports	Julie.Beaubien@dfo-mpo.gc.ca

Describe how this person was involved?

Manages personnel security screening section, lead search of files and also contacted Transport Canada

3. Name	Title/Position	Contact Information
Guy Morgan	Head of Personnel Security – Transport Canada	Guy.Morgan@tc.gc.ca

Describe how this person was involved?

Was informed of the incident and requested to verify personnel security files at Transport Canada for missing file.

Please use the following space to provide any other information that may be relevant to the incident (i.e., previous incidents that are similar or related privacy breaches).

PART 2 – Assurances

I attest that, to my knowledge, the information presented in the form above is accurate.

Name/Title/Phone Number:

Darren Costain – Deputy Director, Security Operations (613) 990-1575

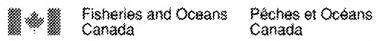
Date submitted to ATIP:

July 11, 2018

Bolger, Charlotte

From: Afram, Prince
Sent: Monday, July 16, 2018 3:05 PM
To: Bolger, Charlotte
Subject: Privacy breach
Attachments: Privacy breach_Charlotte.docx

As discussed.



Access to Information and Privacy

PRIVACY BREACH REPORT

FOR ATIP USE ONLY
ATIP FILE NUMBER PB-2018-00161
PROTECTED B

Privacy Notice

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PART 1 – Incident Details

Date of Incident: Between November 2, 2016 and June 20, 2018	Time of Incident:	Location of Incident: NCR
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Brief description of the incident as reported to ATIP (what happened, how it happened, how it was discovered, etc.):

Personnel Security Screening file for [REDACTED] went missing when transferred between departments around November 2, 2016. It was only recently discovered missing when we received a request to verify his clearance for another department.

[REDACTED] was seconded to DFO [REDACTED]. DFO requested [REDACTED] file on October 6, 2016; however, subsequently cancelled the request because [REDACTED] at the time was only on secondment with our department. Transport had already transferred the file and DFO received the file on (or around) November 2, 2016. DFO immediately returned the file to Transport with explanation that the employee was only on secondment.

DFO has conducted a thorough search of its files to no avail.

Identify the individual(s) whose personal information was compromised (include contact info if possible). Attach a list if necessary.

[REDACTED] His home address on file is :

Is the individual(s) aware of the incident? Format of information involved:

Yes No Electronic Paper Other (describe):

Elements of personal information breached (Please refer to Categories of Personal Information)

- Biographical information
- Contact information
- Criminal checks/history
- Educational information
- Credit card information
- Date of birth

Commented [D1]: Limit any further disclosure of personal information.

- Citizenship status
- Credit history
- Employee personnel information
- Financial information
- Other ID numbers (FIN, driver's license etc)
- Place of birth
- Signature
- Gender
- Name
- Photographs of individuals

Immediate containment measures taken:

The employee was advised immediately and a new credit check was completed and provided to the employee to ensure no identity theft occurred. A throughout search of DFO files was completed without success. Transport Canada, Personnel Security Division was advised and requested to verify files, no response to date.

Has the supervisor or program manager been notified of the incident? Yes No

Individuals involved and their role in the incident:

1. Name Darren Costain	Title/Position Deputy Director, Security Operations	Contact Information Darren.Costain@dfo-mpo.gc.ca
Describe how this person was involved? Informed affected employee directed a search of files and contacted Transport Canada.		
2. Name Julie Beaubien	Title/Position Manager Personnel Security and Passports	Contact Information Julie.Beaubien@dfo-mpo.gc.ca
Describe how this person was involved? Manages personnel security screening section, lead search of files and also contacted Transport Canada		
3. Name Guy Morgan	Title/Position Head of Personnel Security-Transport Canada	Contact Information Guy Morgan@tc.gc.ca
Describe how this person was involved? Was informed of the incident and requested to verify personnel security files at Transport Canada for missing file.		

PART 2 – Analysis

Privacy Breach Determination Summary	
Improper or unauthorized access to personal information	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Improper or unauthorized collection of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized use of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized disclosure of personal information	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Improper or unauthorized retention of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized disposal of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
This incident is considered to be a privacy breach – at least one yes answer	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Material Privacy Breach Determination	
Sensitive Personal Information Criteria	
Medical, psychiatric or psychological information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information compiled and identifiable as part of an investigation into a possible violation of law	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Criminal history	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Information on the eligibility for social benefits or the determination of benefit levels	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information describing an individual's finances (income, assets, liabilities, net worth, bank balances, tax returns, financial history or activities, or creditworthiness)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Information containing personal recommendations or evaluations, personal opinions about a sensitive subject, character references, or personnel evaluations	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information concerning an individual's racial, ethnic origin, religious, political beliefs and associations or lifestyle	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Certain tombstone information, including birthdate and Social Insurance Number	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Commented [D2]: Check to see if file included criminal history of subject.

Serious Injury or Harm Criteria and/or Involves a Large Number of Affected Individuals	
Identity theft or some other related fraud	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Material loss to the individual	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Lasting harm or embarrassment that will have direct negative effects on a litigation involving the individual, on an individual's career, reputation, financial position, safety, health or well-being	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The breach involves a large number (over 100) of affected individuals	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Material Privacy Breach Determination Summary	
Sensitive personal information criteria met	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Serious injury or harm criteria met <u>and/or</u> involves a large number of affected individuals	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
This is a material privacy breach – both of the above criteria are met	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

PART 3—Risk Impact to the Individual

Is there a possibility of risk impact to the individual regarding the following:

Financial loss to the individual(s) through identity theft or fraud, inconvenience due to changing financial arrangements, loss of wages or of job lost employment or business opportunities, loss of promotion, increased costs or loss of insurance, pension loss, or any other financial implication.

Yes No

Health Implications – physical safety (security risk) or mental harm to the individual(s) through violence, loss of sleep, heart attack, stress or a breakdown of relationships, physiological impact (loss of sleep, stomach problems, heart attack, long-term medication regime), psychological impact (stress, breakdown of relationships).

Yes No

Reputational harm to the individual(s) through hurt, humiliation, embarrassment, discrimination, or loss of professional/personal standing.

Commented [D3]: If file includes sensitivities such as criminal history

Yes No

Legal harm to the individual(s) through civil or criminal charges, fines, or imprisonment, possible application of foreign laws (disclosure to foreign government for unrelated use).

Yes No

PART 4 – Risk Impact to DFO/CCG

Risk Impact to DFO/CCG – Severity of Impact

	Negligible	Low	Medium	High	Severe
Loss of Confidence or Trust	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Legal Proceedings (Lawsuit)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harm to National Interest	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Operational Harm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Appendix B of the [Guideline on Defining Authentication Requirements](#) provides examples for the categories of harm that can be used as part of the assessment process.

Risk Impact to DFO/CCG – Probability of Occurrence

	N/A	Unlikely	Rare	Likely	Very Likely
Loss of Confidence or Trust	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Legal Proceedings (Lawsuit)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harm to National Interest	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Operational Harm	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

PART 5 – Summary of Investigations and Findings

Sarah spoke to Darren from DFO security July 11, 2018. DFO believes they sent Personnel Security Screening file back to Transport Canada in 2016. However, DFO recently attempted to find the file and it appeared that neither DFO nor Transport Canada had it. The transmittal slip that confirmed DFO sending the file to Transport Canada has been destroyed. Therefore, it is unclear whether the file was lost by DFO or by Transport Canada.

The loss of this file causes a risk of identify theft or fraud to [REDACTED] This breach is therefore material because it has the potential to cause serious injury or harm.

This is a material privacy breach, but it is not known at this time whether this is a DFO privacy breach or a Transport Canada privacy breach.

Part 6 – Recommendations**Training**

The employee who caused this privacy breach should update their privacy awareness training. Management should also encourage employees within their business unit to update their security and privacy awareness training.

As per standard procedure, the following will receive a copy of this report: staff member who caused the breach (and/or was involved in the breach); staff member's manager; ATIP Director & Deputy Director (Policy and Privacy Division); Departmental Security Officer (DSO); and Chief Privacy Officer (CPO).

Notification

The individual(s) affected by the breach should be notified. Yes No
The individual involved has already been notified.

Part 7 – Signatures

Employee	Signature	Date
ATIP Investigator	Charlotte Bolger	
Deputy Director, ATIP	Melanie Davis	
A/Director, ATIP	Jonathan Macdonald	

Bolger, Charlotte

From: Afram, Prince
Sent: Tuesday, July 17, 2018 1:57 PM
To: Bolger, Charlotte
Subject: RE: Privacy Breach security file

So in that case we can leave the criminal history uncheck under sensitive personal information

From: Bolger, Charlotte
Sent: July-17-18 1:49 PM
To: Afram, Prince
Subject: Privacy Breach security file

Hi Prince,

I emailed Darren Costain with some questions about the security file that was lost. Darren said that the file included the fact that the individual did not have criminal history. Would this still count as personal information?

Thanks,

Charlotte

Bolger, Charlotte

From: Bolger, Charlotte
Sent: Tuesday, July 17, 2018 2:00 PM
To: Davis, Melanie
Subject: Draft Privacy Breach Report
Attachments: Draft PB report.docx

Hi Melanie,

Here is the updated privacy breach report.

Thanks,

Charlotte



Access to Information and Privacy

PRIVACY BREACH REPORT

FOR ATIP USE ONLY
ATIP FILE NUMBER PB-2018-00161
PROTECTED B

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PART 1 – Incident Details

Date of Incident: Between November 2, 2016 and June 20, 2018	Time of Incident:	Location of Incident: NCR
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Brief description of the incident as reported to ATIP (what happened, how it happened, how it was discovered, etc.):

Personnel Security Screening file for [REDACTED] went missing when transferred between departments around November 2, 2016. It was only recently discovered missing when we received a request to verify his clearance from another department.

[REDACTED] was seconded to DFO [REDACTED] DFO requested [REDACTED] file on October 6, 2016; however, subsequently cancelled the request because [REDACTED] at the time was only on secondment with our department. Transport had already transferred the file and DFO received the file on (or around) November 2, 2016. DFO immediately returned the file to Transport with explanation that the employee was only on secondment.

DFO has conducted a thorough search of its files to no avail.

Identify the individual(s) whose personal information was compromised (include contact info if possible). Attach a list if necessary.

[REDACTED]

Is the individual(s) aware of the incident?	Format of information involved:
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Electronic <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (describe):

Elements of personal information breached (Please refer to Categories of Personal Information)

- Biographical information
- Contact information
- Criminal checks/history
- Educational information
- Credit card information

- Date of birth
- Citizenship status
- Credit history
- Employee personnel information
- Financial information
- Driver's licence number
- Place of birth
- Signature
- Gender
- Name
- Photographs of individuals

Immediate containment measures taken:

The employee was advised immediately and a new credit check was completed and provided to the employee to ensure no identity theft occurred. A thorough search of DFO files was completed without success. Transport Canada, Personnel Security Division was advised and requested to verify files, no response to date.

Has the supervisor or program manager been notified of the incident?

Yes No

Individuals involved and their role in the incident:

1. Name Darren Costain	Title/Position Deputy Director, Security Operations	Contact Information Darren.Costain@dfo-mpo.gc.ca
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Describe how this person was involved?

Informed affected employee directed a search of files and contacted Transport Canada.

2. Name Julie Beaubien	Title/Position Manager Personnel Security and Passports	Contact Information Julie.Beaubien@dfo-mpo.gc.ca
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Describe how this person was involved?

Manages personnel security screening section, lead search of files and also contacted Transport Canada

3. Name Guy Morgan	Title/Position Head of Personnel Security-Transport Canada	Contact Information Guy Morgan@tc.gc.ca
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Describe how this person was involved?

Was informed of the incident and requested to verify personnel security files at Transport Canada for missing file.

PART 2 – Analysis

Privacy Breach Determination Summary

Improper or unauthorized access to personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized collection of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized use of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized disclosure of personal information	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Improper or unauthorized retention of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized disposal of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
This incident is considered to be a privacy breach – at least one yes answer	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Material Privacy Breach Determination

Sensitive Personal Information Criteria

Medical, psychiatric or psychological information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information compiled and identifiable as part of an investigation into a possible violation of law	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Criminal history	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information on the eligibility for social benefits or the determination of benefit levels	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information describing an individual's finances (income, assets, liabilities, net worth, bank balances, tax returns, financial history or activities, or creditworthiness)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Information containing personal recommendations or evaluations, personal opinions about a sensitive subject, character references, or personnel evaluations	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information concerning an individual's racial, ethnic origin, religious, political beliefs and associations or lifestyle	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Certain tombstone information, including birthdate and Social Insurance Number	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Serious Injury or Harm Criteria and/or Involves a Large Number of Affected Individuals

Identity theft or some other related fraud	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Material loss to the individual	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Lasting harm or embarrassment that will have direct negative effects on a litigation involving the individual, on an individual's career, reputation, financial position, safety, health or well-being	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The breach involves a large number (over 100) of affected individuals	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Material Privacy Breach Determination Summary

Sensitive personal information criteria met	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Serious injury or harm criteria met <u>and/or</u> involves a large number of affected individuals	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
This is a material privacy breach – both of the above criteria are met	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

PART 3– Risk Impact to the Individual

Is there a possibility of risk impact to the individual regarding the following:

Financial loss to the individual(s) through identity theft or fraud, inconvenience due to changing financial arrangements, loss of wages or of job lost employment or business opportunities, loss of promotion, increased costs or loss of insurance, pension loss, or any other financial implication.

Yes No

Health Implications – physical safety (security risk) or mental harm to the individual(s) through violence, loss of sleep, heart attack, stress or a breakdown of relationships, physiological impact (loss of sleep, stomach problems, heart attack, long-term medication regime), psychological impact (stress, breakdown of relationships).

Yes No

Reputational harm to the individual(s) through hurt, humiliation, embarrassment, discrimination, or loss of professional/personal standing.

Yes No

Legal harm to the individual(s) through civil or criminal charges, fines, or imprisonment, possible application of foreign laws (disclosure to foreign government for unrelated use).

Yes No

PART 4 – Risk Impact to DFO/CCG

Risk Impact to DFO/CCG – Severity of Impact

	Negligible	Low	Medium	High	Severe
Loss of Confidence or Trust	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Legal Proceedings (Lawsuit)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harm to National Interest	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Operational Harm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Appendix B of the [Guideline on Defining Authentication Requirements](#) provides examples for the categories of harm that can be used as part of the assessment process.

Risk Impact to DFO/CCG – Probability of Occurrence

	N/A	Unlikely	Rare	Likely	Very Likely
Loss of Confidence or Trust	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Legal Proceedings (Lawsuit)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harm to National Interest	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Operational Harm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

PART 5 – Summary of Investigations and Findings

The Deputy Director of Security Operations, DFO and the Manager of Personnel Security and Passports, DFO believe [REDACTED] security file was sent to Transport Canada, but have no way to confirm this, as they believe the transmittal slip was destroyed. Transport Canada has not been able to locate the file; therefore, it can be presumed to be lost. The security file contains a large amount of sensitive information, which makes identity theft or fraud a real possibility if it is not recovered. The breach is therefore material because it has the potential to cause serious injury or harm to [REDACTED]

Part 6 – Recommendations

Training

The employee who was responsible for this privacy breach should update their privacy awareness training. Management should also encourage employees within their business unit to update their security and privacy awareness training.

As per standard procedure, the following will receive a copy of this report: staff member who caused the breach (and/or was involved in the breach); staff member's manager; ATIP Director & Deputy Director (Policy and Privacy Division); Departmental Security Officer (DSO); and Chief Privacy Officer (CPO).

Program recommendation

Personnel Security and Passports should develop a method to better keep track of security files the program is sending and receiving. Transmittal slips may need to be kept for a longer time. Otherwise, a record should be kept of which transmittal slips are being destroyed.

Notification

The individual(s) affected by the breach should be notified.

Yes No

The individual involved has already been notified.

Part 7 – Signatures

Employee	Signature	Date
ATIP Investigator	Charlotte Bolger	
Deputy Director, ATIP	Melanie Davis	
A/Director, ATIP	Jonathan Macdonald	

Bolger, Charlotte

From: Bolger, Charlotte
Sent: Wednesday, July 18, 2018 9:00 AM
To: Davis, Melanie
Subject: Abridged privacy breach report
Attachments: PRIVACY BREACH REPORT.pdf

PRIVACY BREACH REPORT

FOR ATIP USE ONLY
 ATIP FILE NUMBER PB-2018-00161
 PROTECTED B

Privacy Notice

Personal information provided on this form is collected under the authority of the *Financial Administration Act* and as required under the *Policy on Government Security*, *Public Service Employment Act*, and the *Criminal Code* for the purpose of investigating and reporting privacy breaches. Other consistent uses and disclosures are described in the *Security Incidents and Privacy Breaches Personal Information Bank (PSU 939)* of *Info Source*. Failure to provide necessary personal information will result in non-compliance with the *DFO Privacy Policy* and may compromise the investigation process. Individuals have the right to the correction of, access to, and protection of, personal information under the *Privacy Act* and to file a complaint with the *Privacy Commissioner of Canada* over DFO's handling of their information. For more information, contact DFOprivacy-vieprivéeMPO@dfo-mpo.gc.ca or visit www.infosource.gc.ca.

PART 1 – Incident Details

Date of Incident: Between November 2, 2016 and June 20, 2018	Time of Incident:	Location of Incident: NCR
Brief description of the incident as reported to ATIP (what happened, how it happened, how it was discovered, etc.): Personnel Security Screening file for [REDACTED] went missing when transferred between departments around November 2, 2016. It was only recently discovered missing when we received a request to verify his clearance from another department. [REDACTED] was seconded to DFO [REDACTED]. DFO requested [REDACTED] file on October 6, 2016; however, subsequently cancelled the request because [REDACTED] at the time was only on secondment with our department. Transport had already transferred the file and DFO received the file on (or around) November 2, 2016. DFO immediately returned the file to Transport with explanation that the employee was only on secondment. DFO has conducted a thorough search of its files to no avail.		

Identify the individual(s) whose personal information was compromised (include contact info if possible). Attach a list if necessary.

[REDACTED]

Is the individual(s) aware of the incident?	Format of information involved:
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Electronic <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (describe):
Elements of personal information breached (Please refer to <u>Categories of Personal Information</u>) -Biographical information -Contact information -Criminal checks -Educational information -Credit card information -Date of birth -Citizenship status -Credit history -Employee personnel information -Financial information -Driver's licence number -Place of birth	

-Signature

-Gender

-Name

-Photographs of individuals

Immediate containment measures taken:

The employee was advised immediately and a new credit check was completed and provided to the employee to ensure no identity theft occurred. A thorough search of DFO files was completed without success. Transport Canada, Personnel Security Division was advised and requested to verify files, no response to date.

Has the supervisor or program manager been notified of the incident?

Yes No

Individuals involved and their role in the incident:

1. Name	Title/Position	Contact Information
Darren Costain	Deputy Director, Security Operations	Darren.Costain@dfo-mpo.gc.ca
Describe how this person was involved? Informed affected employee directed a search of files and contacted Transport Canada.		
2. Name	Title/Position	Contact Information
Julie Beaubien	Manager Personnel Security and Passports	Julie.Beaubien@dfo-mpo.gc.ca
Describe how this person was involved? Manages personnel security screening section, lead search of files and also contacted Transport Canada		
3. Name	Title/Position	Contact Information
Guy Morgan	Head of Personnel Security-Transport Canada	Guy Morgan@tc.gc.ca
Describe how this person was involved? Was informed of the incident and requested to verify personnel security files at Transport Canada for missing file.		

Bolger, Charlotte

From: Davis, Melanie
Sent: Wednesday, July 18, 2018 9:15 AM
To: 'Anne.Blais@tc.gc.ca'
Cc: Bolger, Charlotte
Subject: RE: Privacy Breach
Attachments: PRIVACY BREACH REPORT.pdf

Hi Anne,

You will find attached, background information on the privacy breach we discussed this morning. If you could follow-up with Personnel Security at Transport Canada to verify if Transport Canada has a record of receiving the file and/or if the file was ever found by Transport Canada it would be greatly appreciated.

Thanks,

Melanie Davis

Deputy Director, ATIP Secretariat
Fisheries and Oceans Canada / Government of Canada
melanie.davis@dfo-mpo.gc.ca / Tel: 613-990-3499 or  (BlackBerry)

Directrice adjointe, Secrétariat de l'AIPRP
Pêches et Océans Canada / Gouvernement du Canada
melanie.davis@dfo-mpo.gc.ca / Tél: 613-990-3499 ou  (BlackBerry)

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PRIVACY BREACH REPORT

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 ATIP FILE NUMBER PB-2018-00161
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PART 1 – Incident Details

Date of Incident:	Time of Incident:	Location of Incident:
Between November 2, 2016 and June 20, 2018		NCR

Brief description of the incident as reported to ATIP (what happened, how it happened, how it was discovered, etc.):

Personnel Security Screening file for [REDACTED] went missing when transferred between departments around November 2, 2016. It was only recently discovered missing when we received a request to verify his clearance from another department.

[REDACTED] was seconded to DFO [REDACTED]. DFO requested [REDACTED] file on October 6, 2016; however, subsequently cancelled the request because [REDACTED] at the time was only on secondment with our department. Transport had already transferred the file and DFO received the file on (or around) November 2, 2016. DFO immediately returned the file to Transport with explanation that the employee was only on secondment.

DFO has conducted a thorough search of its files to no avail.

Identify the individual(s) whose personal information was compromised (include contact info if possible). Attach a list if necessary.

[REDACTED]

Is the individual(s) aware of the incident?	Format of information involved:
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Electronic <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (describe):

Elements of personal information breached (Please refer to *Categories of Personal Information*)

- Biographical information
- Contact information
- Criminal checks
- Educational information
- Credit card information
- Date of birth
- Citizenship status
- Credit history
- Employee personnel information
- Financial information
- Driver's licence number
- Place of birth

-Signature
-Gender
-Name
-Photographs of individuals

Immediate containment measures taken:

The employee was advised immediately and a new credit check was completed and provided to the employee to ensure no identity theft occurred. A thorough search of DFO files was completed without success. Transport Canada, Personnel Security Division was advised and requested to verify files, no response to date.

Has the supervisor or program manager been notified of the incident? Yes No

Individuals involved and their role in the incident:

1. Name Darren Costain	Title/Position Deputy Director, Security Operations	Contact Information Darren.Costain@dfo-mpo.gc.ca
---------------------------	--	--

Describe how this person was involved?

Informed affected employee directed a search of files and contacted Transport Canada.

2. Name Julie Beaubien	Title/Position Manager Personnel Security and Passports	Contact Information Julie.Beaubien@dfo-mpo.gc.ca
---------------------------	---	--

Describe how this person was involved?

Manages personnel security screening section, lead search of files and also contacted Transport Canada

3. Name Guy Morgan	Title/Position Head of Personnel Security-Transport Canada	Contact Information Guy Morgan@tc.gc.ca
-----------------------	--	---

Describe how this person was involved?

Was informed of the incident and requested to verify personnel security files at Transport Canada for missing file.

From: Costain, Darren
To: Bolger, Charlotte
Cc: Davis, Melanie
Subject: RE: Suspected privacy breach-lost personnel file
Date: Wednesday, July 18, 2018 9:47:05 AM

Hi Charlotte,

No, the SIN number should not have been on the file.

Yes for ethnic origin, since the file has place of birth. For associations it does contain employment history, contact information for family members and three references. (not racial, religious, political or lifestyle).

Darren

From: Bolger, Charlotte
Sent: July-18-18 9:06 AM
To: Costain, Darren
Cc: Davis, Melanie
Subject: RE: Suspected privacy breach-lost personnel file

Thanks Darren,

Sorry I have two more quick questions:

Did the missing file contain the employee's SIN number?

Did the missing file contain information concerning the employee's racial, ethnic origin, religious, political beliefs and associations or lifestyle?

Thanks,

Charlotte

From: Costain, Darren
Sent: Tuesday, July 17, 2018 12:06 PM
To: Bolger, Charlotte <Charlotte.Bolger@dfo-mpo.gc.ca>
Cc: Davis, Melanie <Melanie.Davis@dfo-mpo.gc.ca>
Subject: RE: Suspected privacy breach-lost personnel file

Hi Charlotte,

See response below....

Darren

From: Bolger, Charlotte
Sent: July-17-18 12:01 PM

To: Costain, Darren
Cc: Davis, Melanie
Subject: Suspected privacy breach-lost personnel file

Good morning,

I am working on the suspected privacy breach that you reported to us last week. I'm wondering if you know whether the security file that was lost contains

- a) The individual's criminal history (In this case there would have been an indication of no criminal history)

Or

- b) Information containing personal recommendations or evaluations, personal information about a sensitive subject, character references or personnel evaluations. (No, no such information)

Thank you,

Charlotte Bolger

ATIP Advisor
Fisheries and Oceans Canada / Government of Canada
Charlotte.Bolger@dfo-mpo.gc.ca / Tel: (613) 991-6631

Conseillière de l'AIPRP
Pêches et Océans Canada / Gouvernement du Canada
Charlotte.Bolger@dfo-mpo.gc.ca / Tel: (613) 991-6631
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Bolger, Charlotte

From: Blais, Anne <Anne.Blais@tc.gc.ca>
Sent: Friday, August 24, 2018 11:39 AM
To: Davis, Melanie
Cc: Bolger, Charlotte; Senevongsa, Stefany
Subject: RE: Privacy Breach

Hi Melanie,

I've asked our colleagues in Personnel Security to provide input. [REDACTED]
but will follow up with you when I return.

Thanks,

Anne Blais
Anne.Blais@tc.gc.ca
613-949-4172

From: Davis, Melanie [mailto:Melanie.Davis@dfo-mpo.gc.ca]
Sent: Wednesday, August 22, 2018 12:28 PM
To: Blais, Anne <Anne.Blais@tc.gc.ca>
Cc: Bolger, Charlotte <Charlotte.Bolger@dfo-mpo.gc.ca>
Subject: RE: Privacy Breach

Hi Anne – Is it possible to get a status update on the breach?

Thanks,

Melanie

From: Davis, Melanie
Sent: July-26-18 8:53 AM
To: 'Blais, Anne'
Cc: Bolger, Charlotte
Subject: RE: Privacy Breach

Hi Anne,

I am just wondering what the status of this breach is.

Thanks,

Melanie

From: Blais, Anne [mailto:Anne.Blais@tc.gc.ca]
Sent: July-18-18 10:35 AM

To: Davis, Melanie
Subject: RE: Privacy Breach

Success! Thank you!

Anne Blais
Anne.Blais@tc.gc.ca
613-949-4172

From: Davis, Melanie [mailto:Melanie.Davis@dfo-mpo.gc.ca]
Sent: Wednesday, July 18, 2018 10:29 AM
To: Blais, Anne <Anne.Blais@tc.gc.ca>
Subject: RE: Privacy Breach

Ok – I just resent. Please let me know if it worked that time.

From: [Davis, Melanie](#)
To: [Bolger, Charlotte](#)
Subject: FW: Privacy Breach
Date: Tuesday, August 28, 2018 9:49:26 AM
Attachments: [PRIVACY BREACH REPORT.pdf](#)

From: Choinière, Angie [mailto:Angie.Choiniere@tc.gc.ca]
Sent: August-24-18 3:52 PM
To: Blais, Anne; McCool, Loretto; Senevongsa, Stefany; Beaubien, Julie; Davis, Melanie; Bolger, Charlotte
Cc: Morgan, Guy; Cadieux-Bruneau, Josee; Wattie, Katharine; St Amour, Terri
Subject: Privacy Breach

Good afternoon,

The report from DFO is not complete.

I was initially contacted by Julie Beaubien in regards to this matter. An extensive search was conducted here at Transport Canada to no avail. The electronic file indicates the original personnel security file was transferred to DFO on 2016-10-26. There is no subsequent record of a returned file in our database.

I communicated with CSIS to inquire which department held the clearance as per their records. On July 3rd, 2018, CSIS confirmed by email that DFO held the secret clearance. I immediately communicated this information to Julie Beaubien by telephone.

In this regard, we do not feel that this is a Transport Canada privacy breach.

Angie Choinière

Superintendent, Security Screening Programs / Surintendant des programmes de filtrage de sécurité
Transport Canada | Transports Canada, Place de Ville, Tower C/Tour C
Ottawa, ON | Ottawa (Ontario) K1A 0N5
Email | courriel : angie.choiniere@tc.gc.ca
Telephone | Téléphone : 613-990-1624
Government of Canada | Gouvernement du Canada

From: Blais, Anne
Sent: Friday, August 24, 2018 11:38 AM
To: McCool, Loretto <loretto.mccool@tc.gc.ca>; Morgan, Guy <guy.morgan@tc.gc.ca>
Cc: Senevongsa, Stefany <Stefany.Senevongsa@tc.gc.ca>
Subject: FW: Privacy Breach

Hi Guy and Loretto,

You are probably already aware of this incident. It seems as though someone's personnel file was lost in transit between TC and DFO. Could you please shed

some light on the matter?

DFO ATIP is managing the privacy incident and would like to know what, if anything, has been done from TC's side.

Please note that I will be out of the office [REDACTED].

Thanks,

Anne Blais
Anne.Blais@tc.gc.ca
613-949-4172

From: Davis, Melanie [mailto:Melanie.Davis@dfo-mpo.gc.ca]
Sent: Wednesday, July 18, 2018 10:28 AM
To: Blais, Anne <Anne.Blais@tc.gc.ca>
Subject: FW: Privacy Breach

From: Davis, Melanie
Sent: July-18-18 9:15 AM
To: 'Anne.Blais@tc.gc.ca'
Cc: Bolger, Charlotte
Subject: RE: Privacy Breach

Hi Anne,

You will find attached, background information on the privacy breach we discussed this morning. If you could follow-up with Personnel Security at Transport Canada to verify if Transport Canada has a record of receiving the file and/or if the file was ever found by Transport Canada it would be greatly appreciated.

Thanks,

Melanie Davis

Deputy Director, ATIP Secretariat
Fisheries and Oceans Canada / Government of Canada
melanie.davis@dfo-mpo.gc.ca / Tel: 613-990-3499 or [REDACTED] (BlackBerry)

Directrice adjointe, Secrétariat de l'AIPRP
Pêches et Océans Canada / Gouvernement du Canada
melanie.davis@dfo-mpo.gc.ca / Tél: 613-990-3499 ou [REDACTED] (BlackBerry)
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without printing, copying or forwarding it. Thank you. / Si vous avez reçu cette communication par erreur, veuillez en aviser l'expéditeur immédiatement et la supprimer sans l'imprimer, la copier, ou la faire suivre. Merci.

PRIVACY BREACH REPORT

FOR ATIP USE ONLY
 ATIP FILE NUMBER PB-2018-00161
 PROTECTED B

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PART 1 – Incident Details

Date of Incident: Between November 2, 2016 and June 20, 2018	Time of Incident:	Location of Incident: NCR
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Brief description of the incident as reported to ATIP (what happened, how it happened, how it was discovered, etc.):

Personnel Security Screening file for [REDACTED] went missing when transferred between departments around November 2, 2016. It was only recently discovered missing when we received a request to verify his clearance from another department.

[REDACTED] was seconded to DFO [REDACTED]. DFO requested [REDACTED] file on October 6, 2016; however, subsequently cancelled the request because [REDACTED] at the time was only on secondment with our department. Transport had already transferred the file and DFO received the file on (or around) November 2, 2016. DFO immediately returned the file to Transport with explanation that the employee was only on secondment.

DFO has conducted a thorough search of its files to no avail.

Identify the individual(s) whose personal information was compromised (include contact info if possible). Attach a list if necessary.

[REDACTED]

Is the individual(s) aware of the incident?	Format of information involved:
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Electronic <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (describe):

Elements of personal information breached (Please refer to Categories of Personal Information)

- Biographical information
- Contact information
- Criminal checks
- Educational information
- Credit card information
- Date of birth
- Citizenship status
- Credit history
- Employee personnel information
- Financial information
- Driver's licence number
- Place of birth

-Signature
-Gender
-Name
-Photographs of individuals

Immediate containment measures taken:

The employee was advised immediately and a new credit check was completed and provided to the employee to ensure no identity theft occurred. A thorough search of DFO files was completed without success. Transport Canada, Personnel Security Division was advised and requested to verify files, no response to date.

Has the supervisor or program manager been notified of the incident?

Yes No

Individuals involved and their role in the incident:

1. Name Darren Costain	Title/Position Deputy Director, Security Operations	Contact Information Darren.Costain@dfo-mpo.gc.ca
---------------------------	--	--

Describe how this person was involved?

Informed affected employee directed a search of files and contacted Transport Canada.

2. Name Julie Beaubien	Title/Position Manager Personnel Security and Passports	Contact Information Julie.Beaubien@dfo-mpo.gc.ca
---------------------------	--	--

Describe how this person was involved?

Manages personnel security screening section, lead search of files and also contacted Transport Canada

3. Name Guy Morgan	Title/Position Head of Personnel Security-Transport Canada	Contact Information Guy Morgan@tc.gc.ca
-----------------------	---	---

Describe how this person was involved?

Was informed of the incident and requested to verify personnel security files at Transport Canada for missing file.

Bolger, Charlotte

From: Bolger, Charlotte
Sent: Wednesday, September 5, 2018 10:41 AM
To: Davis, Melanie
Subject: Draft OPC report
Attachments: Draft OPC report September 5.docx

Hi Melanie,

I've completed the draft OPC report for your review.

Thanks,

Charlotte



Privacy Act Breach Report

For Use by Government of Canada Institutions

Reporting Breaches Under the *Privacy Act*

Federal institutions subject to the *Privacy Act* are required to notify the Office of the Privacy Commissioner of Canada (OPC) and the Treasury Board of Canada Secretariat of all material privacy breaches and of the mitigation measures being implemented, if the breach involves sensitive personal information and could reasonably be expected to cause serious injury to the individual.

This reporting form outlines the information that should be provided to the OPC. Report the breach promptly rather than waiting to compile all the information requested in the form. Please note that the completed report is intended to provide detailed information about the breach itself but **must not include personal information or protected/classified information**.

The breach report will help determine the type of intervention required by the OPC, such as an informal discussion or an investigation.

Federal institutions should also refer to the Treasury Board's [Guidelines for Privacy Breaches](#). They may also wish to refer to our office's private sector guide, [Key Steps for Organizations in Responding to Privacy Breaches](#).

Date of Breach and Contact Information:

Date of the breach:	Between November 2, 2016 and June 20, 2018
Date the breach is reported to the Office of the Privacy Commissioner:	
Name of the institution:	Fisheries and Oceans
ATIP Office contact for the institution (name, title, telephone number, address, email):	Jonathan Macdonald A/Director Access to Information and Privacy 200 Kent Street, 4 th Floor, Ottawa, Ontario K1A 0E6 613-996-8937 jonathan.macdonald@dfo-mpo.gc.ca
Contact within department other than the ATIP Office (i.e., Department Security, Internal Investigations), if applicable (name, title, telephone number, address, email):	Darren Costain Deputy Director Security Operations 200 Kent Street, 4 th floor, Ottawa, Ontario K1A 0E6 613-990-1575 darren.costain@dfo-mpo.gc.ca

Privacy Act Breach Report

Coordinates of other contacts, if applicable (name, telephone number, address, email):	Melanie Davis A/Deputy Director, Privacy and Policy Division 200 Kent Street, 4 th floor, Ottawa, Ontario K1A 0E6 613-990-3499 Melanie.Davis@dfo-mpo.gc.ca
---	--

Details of the Breach:

Description of the breach (e.g. cause, any technological issues involved, location, geographical area affected, and discovery):	<p>DFO requested a paper copy of the affected individual's Personnel Security Screening file, in error, from Transport Canada on October 6, 2016; however, this individual was only on secondment, so DFO should not have requested this file. This individual was seconded to DFO from Transport Canada [REDACTED]. DFO realised their mistake and subsequently cancelled the request for the file. Transport Canada had already transferred the file (their records indicate they sent it out October 26, 2016) and DFO received the file on (or around) November 2, 2016. According to DFO, the file was immediately returned to Transport Canada with an explanation that the employee was only on secondment. However, DFO Security has no record of returning it as they have destroyed all transmittal slips from that period of time. Transport Canada does not believe that the individual's file was ever returned to them as they have no record of receiving it after October 26, 2016. The file was discovered to be missing on June 20, 2018 when the individual accepted a position [REDACTED] requested his security file from DFO. DFO and Transport Canada both conducted thorough searches of their records. Neither department was able to locate it. On July 3, 2018 Transport Canada verified with CSIS that DFO held the individual's security clearance. This breach affected one individual who is located in the NCR.</p>
Description of the type of personal information involved (e.g. name, contact information, financial, medical, Social Insurance Number, Personal Information Bank number): IMPORTANT: Do not include the personal information in question.	Biographical information, contact information, financial information, criminal checks, educational information, date of birth, citizenship status, credit history, employee personnel information, credit history, driver's licence number, place of birth, signature, gender, name, photographs of individual.
If the breach involved the loss or theft of a computer, tablet or USB key, was it password-protected or encrypted and, if so, what is the procedure for implementing such protection?	n/a
How many individuals are affected?	1
What is the status of individuals affected? (e.g. employees, contractors, public, clients)	Employee [REDACTED]
Do the parties know each other? (e.g. co-workers, ex-spouses)	n/a-only 1 individual affected
Does the breach involve paper or electronic records?	Paper
How broadly has the personal information been disclosed?	Unknown
Has any other organization (e.g. law enforcement) been notified of the breach? If so, when was this organization notified?	No
Is there any other investigation related to the breach? (e.g. security, criminal)	No

Privacy Act Breach Report

Actions Anticipated or Taken Following the Breach:

Describe the measures taken to contain the breach:	A thorough search was conducted for the missing file but it remains lost.
Has the information been recovered? If not, explain what steps are being taken:	No, the file is still lost
Have the affected individuals been notified of the breach and of their right to complain to the Office of the Privacy Commissioner, or will they be notified? (e.g., by letter, telephone)	Yes, the affected individual was notified by DFO Security.
Describe the measures contemplated or being taken to prevent a recurrence (e.g. training, new policies or procedures):	It has been recommended that the employee responsible for the breach updates their privacy awareness training. It has also been recommended that Personnel Security and Passports develop a tracking method of incoming and outgoing files. TBS retention standards should be reviewed and transmittal slips may need to be kept for a longer period of time. A record should be kept of which transmittal slips are being destroyed.

Please submit this form to the Office of the Privacy Commissioner of Canada and the Treasury Board of Canada Secretariat through one of the following means:

By postal mail or by hand:

Notification Officer	Privacy Policy Unit
Privacy Act Investigations Branch	Information and Privacy Policy Division
Office of the Privacy Commissioner of Canada	Chief Information Officer Branch
30 Victoria Street, 1 st Floor	Treasury Board of Canada Secretariat
Gatineau, QC K1A 1H3	90 Elgin Street, 4 th Floor
	Ottawa, ON K1A 0R5

By email:

notification@priv.gc.ca sec@tbs-sct.gc.ca

Should you require additional information, please call the Notification Officer at 819-994-5444 or 1-800-282-1376 (toll-free).

From: [Costain, Darren](#)
To: [Davis, Melanie](#)
Cc: [Bolger, Charlotte](#); [Macdonald, Jonathan](#)
Subject: RE: Privacy Breach Report for the OPC and the TBS
Date: Thursday, September 6, 2018 3:38:07 PM
Attachments: [Material Privacy Breach.pdf](#)

Looks accurate.

Darren

From: Davis, Melanie
Sent: September-06-18 3:04 PM
To: Costain, Darren
Cc: Bolger, Charlotte; Macdonald, Jonathan
Subject: Privacy Breach Report for the OPC and the TBS

Hi Darren,

As per the [TBS Guidelines for Privacy Breaches](#), there is a mandatory reporting requirement of material privacy breaches to the Office of the Privacy Commissioner and the Treasury Board of Canada Secretariat.

Attached is the material privacy breach report, DFO ATIP proposes sending to the OPC and the TBS. Please verify the attached report for accuracy.

Thanks,

Melanie

From: Bolger, Charlotte
Sent: September-04-18 11:32 AM
To: Costain, Darren; Pearcey, Dawn; Davis, Melanie; Macdonald, Jonathan; Boudreau-Brown, Nadine
Subject: Privacy Breach Final Report - PB-2018-00394 / CB

This e-mail is being sent on behalf of the A/Director of the ATIP Secretariat, Jonathan Macdonald.

Please note that the attached report is PROTECTED B and can only be saved on a restricted network with PKI encryption.

Good morning,

Further to the Suspected Privacy Breach Report submitted to the ATIP Secretariat on July 11, 2018, you will find attached the final report.

Please note the report contains recommendations for your action. The ATIP Secretariat will follow up within 2 weeks to discuss any residual items.

If you have any questions or concerns in the meantime, do not hesitate to contact me.

As per standard procedure, this e-mail is copied to your manager, ATIP Deputy Director (Policy and Privacy Division), ATIP Director, Chief Privacy Officer and the Departmental Security Officer.

Thank you,

Charlotte Bolger

ATIP Advisor
Fisheries and Oceans Canada / Government of Canada
Charlotte.Bolger@dfo-mpo.gc.ca / Tel: (613) 991-6631

Conseillière de l'AIPRP
Pêches et Océans Canada / Gouvernement du Canada
Charlotte.Bolger@dfo-mpo.gc.ca / Tel: (613) 991-6631
If you have received this communication by mistake, please notify the sender immediately and delete the communication without printing, copying or forwarding it. Thank you. / Si vous avez reçu cette communication par erreur, veuillez en aviser l'expéditeur immédiatement et la supprimer sans l'imprimer, la copier, ou la faire suivre. Merci.

From: [Bolger, Charlotte](#)
To: [Costain, Darren](#); [Pearcey, Dawn](#); [Davis, Melanie](#); [Macdonald, Jonathan](#); [Boudreau-Brown, Nadine](#)
Subject: Privacy Breach Final Report - PB-2018-00394 / CB
Date: Tuesday, September 4, 2018 11:31:00 AM
Attachments: [PB-2018-00394.pdf](#)

This e-mail is being sent on behalf of the A/Director of the ATIP Secretariat, Jonathan Macdonald.

Please note that the attached report is PROTECTED B and can only be saved on a restricted network with PKI encryption.

Good morning,

Further to the Suspected Privacy Breach Report submitted to the ATIP Secretariat on July 11, 2018, you will find attached the final report.

Please note the report contains recommendations for your action. The ATIP Secretariat will follow up within 2 weeks to discuss any residual items.

If you have any questions or concerns in the meantime, do not hesitate to contact me.

As per standard procedure, this e-mail is copied to your manager, ATIP Deputy Director (Policy and Privacy Division), ATIP Director, Chief Privacy Officer and the Departmental Security Officer.

Thank you,

Charlotte Bolger

ATIP Advisor
Fisheries and Oceans Canada / Government of Canada
Charlotte.Bolger@dfo-mpo.gc.ca / Tel: (613) 991-6631

Conseillère de l'AI-PRP
Pêches et Océans Canada / Gouvernement du Canada
Charlotte.Bolger@dfo-mpo.gc.ca / Tel: (613) 991-6631
If you have received this communication by mistake, please notify the sender immediately and delete the communication without printing, copying or forwarding it. Thank you. / Si vous avez reçu cette communication par erreur, veuillez en aviser l'expéditeur immédiatement et la supprimer sans l'imprimer, la copier, ou la faire suivre. Merci.



Access to Information and Privacy

PRIVACY BREACH REPORT

FOR ATIP USE ONLY
ATIP FILE NUMBER PB-2018-00161
PROTECTED B

Privacy Notice

Personal information provided on this form is collected under the authority of the *Financial Administration Act* and as required under the *Policy on Government Security*, *Public Service Employment Act*, and the *Criminal Code* for the purpose of investigating and reporting privacy breaches. Other consistent uses and disclosures are described in the *Security Incidents and Privacy Breaches Personal Information Bank (PSU 939)* of *Info Source*. Failure to provide necessary personal information will result in non-compliance with the DFO Privacy Policy and may compromise the investigation process. Individuals have the right to the correction of, access to, and protection of, personal information under the *Privacy Act* and to file a complaint with the Privacy Commissioner of Canada over DFO's handling of their information. For more information, contact DFOprivacy-vieprivéeMPO@dfo-mpo.gc.ca or visit www.infosource.gc.ca.

PART 1 – Incident Details

Date of Incident: Between November 2, 2016 and June 20, 2018	Time of Incident:	Location of Incident: NCR
--	-------------------	------------------------------

Brief description of the incident as reported to ATIP (what happened, how it happened, how it was discovered, etc.):

DFO requested [REDACTED] Personnel Security Screening file, in error, from Transport Canada on October 6, 2016; however, [REDACTED] was only on secondment, so DFO should not have requested this file. [REDACTED] was seconded to DFO from Transport Canada [REDACTED]

[REDACTED]
DFO realised their mistake and subsequently cancelled the request for the file.

Transport Canada had already transferred [REDACTED] security file (their records indicate they sent it out October 26, 2016) and DFO received the file on (or around) November 2, 2016.

According to DFO, the file was immediately returned to Transport Canada with an explanation that the employee was only on secondment. However, DFO Security has no record of returning it as they have destroyed all transmittal slips from that period of time.

Transport Canada does not believe that [REDACTED] file was ever returned to them as they have no record of receiving it after October 26, 2016.

[REDACTED] Personnel Security Screening file was discovered to be missing on June 20, 2018 when [REDACTED] accepted a position [REDACTED] requested his security file from DFO.

DFO and Transport Canada both conducted thorough searches of their records. Neither department was able to locate it.

On July 3, 2018 Transport Canada verified with CSIS that DFO held [REDACTED] security clearance.

Identify the individual(s) whose personal information was compromised (include contact info if possible). Attach a list if necessary.

Is the individual(s) aware of the incident?		Format of information involved:
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Electronic <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (describe):
Elements of personal information breached (Please refer to Categories of Personal Information) <ul style="list-style-type: none"> -Biographical information -Contact information -Criminal checks/history -Educational information -Credit card information -Date of birth -Citizenship status -Credit history -Employee personnel information -Financial information -Driver's licence number -Place of birth -Signature -Gender -Name -Photographs of individuals 		
Immediate containment measures taken: <p>The employee was advised immediately and a new credit check was completed and provided to the employee to ensure no identity theft occurred. A thorough search of DFO files was completed without success. Transport Canada, Personnel Security Division was advised and requested to verify files. Transport Canada was unable to locate these files.</p>		
Has the supervisor or program manager been notified of the incident?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Individuals involved and their role in the incident:		
1. Name Darren Costain	Title/Position Deputy Director, Security Operations	Contact Information Darren.Costain@dfo-mpo.gc.ca
Describe how this person was involved? Informed affected employee directed a search of files and contacted Transport Canada.		
2. Name Julie Beaubien	Title/Position Manager Personnel Security and Passports	Contact Information Julie.Beaubien@dfo-mpo.gc.ca
Describe how this person was involved? Manages personnel security screening section, led search of files and also contacted Transport Canada		
3. Name Guy Morgan	Title/Position Head of Personnel Security-Transport Canada	Contact Information Guy Morgan@tc.gc.ca
Describe how this person was involved? Was informed of the incident and requested to verify personnel security files at Transport Canada for missing file.		

PART 2 – Analysis**Privacy Breach Determination Summary**

Improper or unauthorized access to personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized collection of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized use of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized disclosure of personal information	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Improper or unauthorized retention of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Improper or unauthorized disposal of personal information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
This incident is considered to be a privacy breach – at least one yes answer	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Material Privacy Breach Determination**Sensitive Personal Information Criteria**

Medical, psychiatric or psychological information	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information compiled and identifiable as part of an investigation into a possible violation of law	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Criminal history	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information on the eligibility for social benefits or the determination of benefit levels	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information describing an individual's finances (income, assets, liabilities, net worth, bank balances, tax returns, financial history or activities, or creditworthiness)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Information containing personal recommendations or evaluations, personal opinions about a sensitive subject, character references, or personnel evaluations	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Information concerning an individual's racial, ethnic origin, religious, political beliefs and associations or lifestyle – <i>contains personnel information which may include information regarding ethnicity</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Certain tombstone information, including birthdate and Social Insurance Number	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Serious Injury or Harm Criteria and/or Involves a Large Number of Affected Individuals

Identity theft or some other related fraud	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Material loss to the individual	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Lasting harm or embarrassment that will have direct negative effects on a litigation involving the individual, on an individual's career, reputation, financial position, safety, health or well-being	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The breach involves a large number (over 100) of affected individuals	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Material Privacy Breach Determination Summary

Sensitive personal information criteria met	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Serious injury or harm criteria met <u>and/or</u> involves a large number of affected individuals	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
This is a material privacy breach – both of the above criteria are met	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

PART 3– Risk Impact to the Individual

Is there a possibility of risk impact to the individual regarding the following:

Financial loss to the individual(s) through identity theft or fraud, inconvenience due to changing financial arrangements, loss of wages or of job lost employment or business opportunities, loss of promotion, increased costs or loss of insurance, pension loss, or any other financial implication.

Yes No

There is a possibility of identity theft due to this privacy breach.

Health Implications – physical safety (security risk) or mental harm to the individual(s) through violence, loss of sleep, heart attack, stress or a breakdown of relationships, physiological impact (loss of sleep, stomach problems, heart attack, long-term medication regime), psychological impact (stress, breakdown of relationships).

Yes No

This privacy breach may cause the individual stress.

Reputational harm to the individual(s) through hurt, humiliation, embarrassment, discrimination, or loss of professional/personal standing.

Yes No

Legal harm to the individual(s) through civil or criminal charges, fines, or imprisonment, possible application of foreign laws (disclosure to foreign government for unrelated use).

Yes No

PART 4 – Risk Impact to DFO/CCG

Risk Impact to DFO/CCG – Severity of Impact

	Negligible	Low	Medium	High	Severe
Loss of Confidence or Trust	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Legal Proceedings (Lawsuit)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harm to National Interest	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Operational Harm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Appendix B of the [Guideline on Defining Authentication Requirements](#) provides examples for the categories of harm that can be used as part of the assessment process.

Risk Impact to DFO/CCG – Probability of Occurrence

	N/A	Unlikely	Rare	Likely	Very Likely
Loss of Confidence or Trust	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Legal Proceedings (Lawsuit)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harm to National Interest	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Operational Harm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

PART 5 – Summary of Investigations and Findings

DFO officials believe that [REDACTED] security file was sent to Transport Canada, but have no way to confirm this, as they believe the transmittal slip was destroyed. Transport Canada's records show that they never received the file after they sent it out to DFO.

Transport Canada contacted CSIS and inquired as to which department held [REDACTED] clearance. On July 3, 2018 CSIS confirmed that DFO held [REDACTED] secret clearance.

[REDACTED] security file can therefore be presumed to have been lost by DFO.

The security file contains a large amount of sensitive information, which makes identity theft or fraud a real possibility if it is not recovered. The breach is therefore material because it has the potential to cause serious injury or harm to [REDACTED]

Part 6 – Recommendations**Training**

The employee who was responsible for this privacy breach should update their privacy awareness training. Management should also encourage employees within their business unit to update their security and privacy awareness training.

As per standard procedure, the following will receive a copy of this report: staff member who caused the breach (and/or was involved in the breach); staff member's manager; ATIP Director & Deputy Director (Policy and Privacy Division); Departmental Security Officer (DSO); and Chief Privacy Officer (CPO).

Program recommendation

Personnel Security should implement a record system for incoming and outgoing files.

Transmittal slips may need to be kept for a longer period of time and a record should be kept of which transmittal slips are being destroyed. A review of TBS retention standards may be necessary for DFO Security Operations, as the transmittal slip was destroyed when less than two years had passed.

Notification

The individual(s) affected by the breach should be notified.

Yes No

The individual involved has already been notified.

As per standard procedure, the following will receive a copy of this report: staff member who reported the breach (and/or was involved in the breach), staff member's manager, ATIP Director and Deputy Director, Departmental Security Officer and Chief Privacy Officer.

As a material breach, TBS and the OPC will be notified by the ATIP Secretariat.

Part 7 – Signatures

Employee	Signature	Date
ATIP Investigator	Charlotte Bolger	Aug 31/18
Deputy Director, ATIP	Melanie Davis	Sept 4/18
A/Director, ATIP	Jonathan Macdonald	Sept 3, 18



[Print Form](#)

Privacy Act Breach Report

For Use by Government of Canada Institutions

Reporting Breaches Under the *Privacy Act*

Federal institutions subject to the *Privacy Act* are required to notify the Office of the Privacy Commissioner of Canada (OPC) and the Treasury Board of Canada Secretariat of all material privacy breaches and of the mitigation measures being implemented, if the breach involves sensitive personal information and could reasonably be expected to cause serious injury to the individual.

This reporting form outlines the information that should be provided to the OPC. Report the breach promptly rather than waiting to compile all the information requested in the form. Please note that the completed report is intended to provide detailed information about the breach itself but **must not include personal information or protected/classified information**.

The breach report will help determine the type of intervention required by the OPC, such as an informal discussion or an investigation.

Federal institutions should also refer to the Treasury Board's *Guidelines for Privacy Breaches*. They may also wish to refer to our office's private sector guide, *Key Steps for Organizations in Responding to Privacy Breaches*.

Date of Breach and Contact Information

Date of the breach: The personnel security screening file was noticed missing on June 20, 2018.

Date the breach is reported to the Office of the Privacy Commissioner: September, 2018

Name of the institution: Fisheries and Oceans Canada

ATIP Office contact for the institution (name, title, telephone number, address, email): Jonathan Macdonald, A/Director, Access to Information and Privacy
200 Kent Street, 4th Floor, Ottawa, Ontario K1A 0E6
613-996-8937, jonathan.macdonald@dfo-mpo.gc.ca

Contact within department other than the ATIP Office (i.e.: Departmental Security, Internal Investigations), if applicable (name, title, telephone number, address, email): Darren Costain, Deputy Director, Security Operations
200 Kent Street, 4th floor, Ottawa, Ontario K1A 0E6
613-990-1575, darren.costain@dfo-mpo.gc.ca

Coordinates of other contacts, if applicable (name, telephone number, address, email): Melanie Davis, Deputy Director, Privacy and Policy Division
200 Kent Street, 4th floor, Ottawa, Ontario K1A 0E6



Office of the
Privacy Commissioner
of Canada

Commissariat
à la protection de
la vie privée du Canada

address, email):

613-990-3499, melanie.davis@dfo-mpo.gc.ca

Details of the Breach

Description of the breach (e.g. cause, any technological issues involved, location, geographical area affected, and discovery):

DFO requested a paper copy of the affected individual's personnel security screening file from Transport Canada, located in the NCR on October 6, 2016. DFO realized the file was not needed - the person was not being permanently deployed to DFO. Although DFO canceled the request for the affected individual's file, Transport Canada had already transferred the file to DFO on October 26, 2016 and DFO received the file on (or around) November 2, 2016. DFO believes, the file was immediately returned to Transport Canada but has no record of it being returned as the transmittal slips from that period of time were destroyed. Transport Canada has no record of receiving the file after the date it was sent to DFO on October 26, 2016. The file was discovered to be missing on June 20, 2018 when the affected individual accepted a position with another government department and his security screening file was requested from DFO. On July 3, 2018, Transport Canada verified with CSIS that DFO held the individual's security clearance.

Description of the type of personal information involved (e.g. name, contact information, financial, medical, Social Insurance Number, Personal Information Bank number): **IMPORTANT: Do not include the personal information in question.**

The personnel security screening file contained: biographical information, contact information, financial information, criminal checks, educational information, date of birth, citizenship status, credit history, employee personnel information, credit history, driver's licence number, place of birth, signature, gender, name, and photographs of individual.

If the breach involved the loss or theft of computer, tablet or USB key, was it password-protected or encrypted and, if so, what is the procedure for implementing such protection?

n/a

How many individuals are affected?

One individual is affected.

What is the status of individuals affected? (e.g. employees, contractors, public, clients)

The status of the individual affected is an employee.

Do the parties know each other? (e.g. co-workers, ex-spouses)

n/a - (Only 1 individual was affected.)

Does the breach involve paper or electronic records?

The breach involves paper records.

How broadly has the personal information been disclosed?

There is no indication to suggest that the information was found outside government.



Office of the
Privacy Commissioner
of Canada

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la vie privée du Canada

Has any other organization (e.g. law enforcement) been notified of the breach? If so, when was this organization notified?

n/a

Is there any other investigation related to the breach? (e.g. security, criminal)

No

Actions Anticipated or Taken Following the Breach

Describe the measures taken to contain the breach:

The employee was advised immediately that their documents were lost. A new credit check was completed and provided to the employee to ensure no identity theft had occurred. A thorough search of files at both DFO and Transport Canada was completed. Neither department was able to locate the missing documents.

Has the information been recovered? If not, explain what steps are being taken:

No, the information has not been recovered despite the thorough search.

Have the affected individuals been notified of the breach and of their right to complain to the Office of the Privacy Commissioner, or will they be notified? (e.g. by letter, telephone)

Yes, the affected individual was notified by DFO Security.

Describe the measures contemplated or being taken to prevent a recurrence (e.g. training, new policies or procedures):

The following measures are being contemplated:

- privacy training for the employees responsible for the breach;
- examining existing business processes that track incoming and outgoing files; and
- reviewing retention standards and transmittal slip procedures.

Please submit this form to the Office of the Privacy Commissioner of Canada and the Treasury Board of Canada Secretariat through one of the following means :

By postal mail or by hand:

Notification Officer
Privacy Act Investigations Branch
Office of the Privacy Commissioner of Canada
30 Victoria Street, 1st Floor
Gatineau, QC K1A 1H3

Privacy Policy Unit
Information and Privacy Policy Division
Chief Information Officer Branch
Treasury Board of Canada Secretariat
90 Elgin Street, 4th Floor
Ottawa, ON K1A 0R5

By email:



Office of the
Privacy Commissioner
of Canada

Commissariat
à la protection de
la vie privée du Canada

notification@priv.gc.ca

sec@tbs-sct.gc.ca

Should you require additional information, please call the Notification Officer at 819-994-5444 or 1-800-282-1376 (toll-free).

From: Notification
To: Davis, Melanie
Cc: Macdonald, Jonathan; Bolger, Charlotte
Subject: DFO Privacy Act Breach Report PB-2018-00394 / CB
Date: Friday, September 7, 2018 5:06:01 PM
Attachments: [image001.png](#)

We acknowledge receipt of your institution's incident report to the Office of the Privacy Commissioner (OPC) of a *Privacy Act* breach.

Our Office will contact you again as soon as we have had the opportunity to review the report. In the meantime, please provide any additional information related to this incident as soon as it becomes available, and quote OPC file PA-053776.

Thank you.

Agent à la notification, Conformité à la Loi sur la protection des renseignements personnels
Commissariat à la protection de la vie privée du Canada
notification@priv.gc.ca / Tél. : 819-994-5444 (direct), 1-800-282-1376 (sans frais)

Notification Officer, Privacy Act Compliance
Office of the Privacy Commissioner of Canada
notification@priv.gc.ca / Tel. : 819-994-5444 (direct), 1-800-282-1376 (toll free)



Commissariat
à la protection de
la vie privée du Canada

Office of the
Privacy Commissioner
of Canada

From: Davis, Melanie [mailto:Melanie.Davis@dfo-mpo.gc.ca]
Sent: September 7, 2018 07:25
To: Notification; ['sec@tbs-sct.gc.ca'](mailto:'sec@tbs-sct.gc.ca)
Cc: Macdonald, Jonathan; Bolger, Charlotte
Subject: Material Privacy Breach DFO - PB-2018-00394 / CB

Good morning,

This email is to notify your offices of a material privacy breach at Fisheries and Oceans Canada as required under TBS' Guidelines for Privacy Breaches and DFO's privacy framework. The attached form describes the breach and the action taken to control the breach. If you require additional information, please don't hesitate to contact me.

Thank you,

Melanie Davis

Deputy Director, ATIP Secretariat

Fisheries and Oceans Canada / Government of Canada

melanie.davis@dfo-mpo.gc.ca / Tel: 613-990-3499 or [REDACTED] (BlackBerry)

Directrice adjointe, Secrétariat de l'AIPRP

Pêches et Océans Canada / Gouvernement du Canada

melanie.davis@dfo-mpo.gc.ca / Tél: 613-990-3499 ou [REDACTED] (BlackBerry)

If you have received this communication by mistake, please notify the sender immediately and delete the communication without printing, copying or forwarding it. Thank you. / Si vous avez reçu cette communication par erreur, veuillez en aviser l'expéditeur immédiatement et la supprimer sans l'imprimer, la copier, ou la faire suivre. Merci.

Attachment: Privacy Breach Incident Report Form

From: [Davis, Melanie](#)
To: ["notification@priv.gc.ca"](#); ["sec@tbs-sct.gc.ca"](#)
Cc: [Macdonald, Jonathan](#); [Bolger, Charlotte](#)
Subject: Material Privacy Breach DFO - PB-2018-00394 / CB
Date: Friday, September 7, 2018 7:24:54 AM
Attachments: [Material Privacy Breach.pdf](#)

Good morning,

This email is to notify your offices of a material privacy breach at Fisheries and Oceans Canada as required under TBS' Guidelines for Privacy Breaches and DFO's privacy framework. The attached form describes the breach and the action taken to control the breach. If you require additional information, please don't hesitate to contact me.

Thank you,

Melanie Davis

Deputy Director, ATIP Secretariat
Fisheries and Oceans Canada / Government of Canada
melanie.davis@dfo-mpo.gc.ca / Tel: 613-990-3499 or  (BlackBerry)

Directrice adjointe, Secrétariat de l'AIPRP
Pêches et Océans Canada / Gouvernement du Canada
melanie.davis@dfo-mpo.gc.ca / Tél: 613-990-3499 ou  (BlackBerry)
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Attachment: Privacy Breach Incident Report Form



[Print Form](#)

Privacy Act Breach Report

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Federal institutions should also refer to the Treasury Board's *Guidelines for Privacy Breaches*. They may also wish to refer to our office's private sector guide, *Key Steps for Organizations in Responding to Privacy Breaches*.

Date of Breach and Contact Information

Date of the breach:	The personnel security screening file was noticed missing on June 20, 2018.
Date the breach is reported to the Office of the Privacy Commissioner:	September, 2018
Name of the institution:	Fisheries and Oceans Canada
ATIP Office contact for the institution (name, title, telephone number, address, email):	Jonathan Macdonald, A/Director, Access to Information and Privacy 200 Kent Street, 4th Floor, Ottawa, Ontario K1A 0E6 613-996-8937, jonathan.macdonald@dfo-mpo.gc.ca
Contact within department other than the ATIP Office (i.e.: Departmental Security, Internal Investigations), if applicable (name, title, telephone number, address, email):	Darren Costain, Deputy Director, Security Operations 200 Kent Street, 4th floor, Ottawa, Ontario K1A 0E6 613-990-1575, darren.costain@dfo-mpo.gc.ca
Coordinates of other contacts, if applicable (name, telephone number, address, email):	Melanie Davis, Deputy Director, Privacy and Policy Division 200 Kent Street, 4th floor, Ottawa, Ontario K1A 0E6



Office of the
Privacy Commissioner
of Canada

Commissariat
à la protection de
la vie privée du Canada

address, email):

613-990-3499, melanie.davis@dfo-mpo.gc.ca

Details of the Breach

Description of the breach (e.g. cause, any technological issues involved, location, geographical area affected, and discovery):

DFO requested a paper copy of the affected individual's personnel security screening file from Transport Canada, located in the NCR on October 6, 2016. DFO realized the file was not needed - the person was not being permanently deployed to DFO. Although DFO canceled the request for the affected individual's file, Transport Canada had already transferred the file to DFO on October 26, 2016 and DFO received the file on (or around) November 2, 2016. DFO believes, the file was immediately returned to Transport Canada but has no record of it being returned as the transmittal slips from that period of time were destroyed. Transport Canada has no record of receiving the file after the date it was sent to DFO on October 26, 2016. The file was discovered to be missing on June 20, 2018 when the affected individual accepted a position with another government department and his security screening file was requested from DFO. On July 3, 2018, Transport Canada verified with CSIS that DFO held the individual's security clearance.

Description of the type of personal information involved (e.g. name, contact information, financial, medical, Social Insurance Number, Personal Information Bank number): **IMPORTANT: Do not include the personal information in question.**

The personnel security screening file contained: biographical information, contact information, financial information, criminal checks, educational information, date of birth, citizenship status, credit history, employee personnel information, credit history, driver's licence number, place of birth, signature, gender, name, and photographs of individual.

If the breach involved the loss or theft of computer, tablet or USB key, was it password-protected or encrypted and, if so, what is the procedure for implementing such protection?

n/a

How many individuals are affected?

One individual is affected.

What is the status of individuals affected? (e.g. employees, contractors, public, clients)

The status of the individual affected is an employee.

Do the parties know each other? (e.g. co-workers, ex-spouses)

n/a - (Only 1 individual was affected.)

Does the breach involve paper or electronic records?

The breach involves paper records.

How broadly has the personal information been disclosed?

There is no indication to suggest that the information was found outside government.



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Has any other organization (e.g. law enforcement) been notified of the breach? If so, when was this organization notified?

n/a

Is there any other investigation related to the breach? (e.g. security, criminal)

No

Actions Anticipated or Taken Following the Breach

Describe the measures taken to contain the breach:

The employee was advised immediately that their documents were lost. A new credit check was completed and provided to the employee to ensure no identity theft had occurred. A thorough search of files at both DFO and Transport Canada was completed. Neither department was able to locate the missing documents.

Has the information been recovered? If not, explain what steps are being taken:

No, the information has not been recovered despite the thorough search.

Have the affected individuals been notified of the breach and of their right to complain to the Office of the Privacy Commissioner, or will they be notified? (e.g. by letter, telephone)

Yes, the affected individual was notified by DFO Security.

Describe the measures contemplated or being taken to prevent a recurrence (e.g. training, new policies or procedures):

The following measures are being contemplated:

- privacy training for the employees responsible for the breach;
- examining existing business processes that track incoming and outgoing files; and
- reviewing retention standards and transmittal slip procedures.

Please submit this form to the Office of the Privacy Commissioner of Canada and the Treasury Board of Canada Secretariat through one of the following means :

By postal mail or by hand:

Notification Officer
Privacy Act Investigations Branch
Office of the Privacy Commissioner of Canada
30 Victoria Street, 1st Floor
Gatineau, QC K1A 1H3

Privacy Policy Unit
Information and Privacy Policy Division
Chief Information Officer Branch
Treasury Board of Canada Secretariat
90 Elgin Street, 4th Floor
Ottawa, ON K1A 0R5

By email:



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notification@priv.gc.ca

sec@tbs-sct.gc.ca

Should you require additional information, please call the Notification Officer at 819-994-5444 or 1-800-282-1376 (toll-free).

Request Summary Report

PB-2018-00394 / CB - Fisheries and Oceans

Category:	Routine	Date on Request:	2018-07-11
Received:	2018-07-11	Date Initially Received:	2018-07-11
Due:	2018-07-25	Requester File Ref. #:	
Closed:	2018-09-18	Jacket Number:	
Officer Assigned:	Bolger, Charlotte	Request Transferred In:	No
Decision Maker:		Days Taken:	69
Days Allowed:	14		

Summary:	Date of incident: Around November 2, 2016 Affected individuals: 1 Summary: Improper or unauthorized disclosure of personal information
Full Text:	[] Personnel Security Screening File went missing when transferred between departments. DFO believes that the file was received by Transport Canada but no longer has the transmittal slip to prove it. Transport Canada has not been able to find the file. The file was transferred in 2016, but it was only discovered to be missing in 2018 when DFO Security received a request to verify his clearance for another department.

ACTIVITY

Action	Contact	Created	Due	Completed	On Hold	Elapsed
5 - RESPONSE-PB	Requester	2018-09-04		2018-09-04	No	0
Comments:						
3. Material PB - Notify OPC and TBS	Access to Information and Privacy - BOLGER, Charlotte	2018-08-30	2018-09-10	2018-09-06	No	4
Comments:	Melanie emailed Security a copy of our report to confirm that he agreed with the findings. He indicated that he did (see attached).					
Email	Access to Information and Privacy - BOLGER, Charlotte	2018-08-28		2018-08-28	No	0
Comments:	Response from Transport Canada, confirming they do not have the file and suggesting that they did not receive it					
2b - Material - YES Fill out the Template	Access to Information and Privacy - BOLGER, Charlotte	2018-08-28		2018-08-28	No	0
Comments:						
1b - Breach - YES	Access to Information and Privacy - BOLGER, Charlotte	2018-08-28		2018-08-28	No	0
Comments:						
Email	Access to Information and Privacy - BOLGER, Charlotte	2018-07-18		2018-08-18	No	31
Comments:						
Email	Access to Information and Privacy - BOLGER, Charlotte	2018-07-17		2018-07-17	No	0
Comments:	Email Darren for clarification on what sensitive information was in the security file.					
4 - Privacy Breach Report	Access to Information and Privacy - BOLGER, Charlotte	2018-07-11		2018-07-11	No	0
Comments:						
Telephone	Access to Information and Privacy - BOLGER, Charlotte	2018-07-11		2018-07-11	No	0
Comments:	Sarah spoke to Darren Costain in DFO Security. He clarified that it is unknown whether the file was lost by DFO or by Transport Canada. Sarah summarized this in an email to me, which is included in the original request.					

Request Summary Report

PB-2018-00394 / CB - Fisheries and Oceans

Original Request	Access to Information and Privacy - BOLGER, Charlotte	2018-07-11	2018-07-11	No	0
Comments: <hr/>					

CLOSING

<i>Date Closed:</i>	2018-09-18	<i>Method of Access:</i>	Not Applicable
<i>Date Communicated:</i>	2018-09-04	<i>Method of Delivery:</i>	Email
<i>Request Disposition:</i>	PPD/AORs -Treated informally	<i>Translation:</i>	
<i>Pages Received:</i>	0	<i>Request Transferred Out:</i>	No
<i>Pages Reviewed:</i>	0		
<i>Pages Released:</i>	0		
<i>Pages Not Relevant:</i>	0		
<i>Comment:</i> <hr/>			
<i>Disposition:</i>		<i>Release Date:</i>	
<i>Pages Reviewed:</i>		<i>Method of Delivery:</i>	
<i>Pages Released:</i>		<i>Translation:</i>	
<i>Pages Not Relevant:</i>		<i>Method of Access:</i>	
<i>Version :</i>			

Sections:

AccessPro Case Management:
AccessPro Redaction: